Docket No. 50-333

Mr. John C. Brons Executive Vice President - Nuclear Generation Power Authority of the State of New York 123 Main Street White Plains, New York 10601

DISTRIBUTION Docket File NRC & Local PDRs PDI-1 Reading SVarga RWessman CVogan RACapra OGC EJordan ACRS (10)

BMarcus Plant File DLaBarge JLinville

Dear Mr. Brons:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - ACCIDENT MONITORING INSTRUMENTATION AMENDMENT - JAMES A. FITZPATRICK NUCLEAR

POWER PLANT (TAC NO. 76938)

Based on our review of your Technical Specification amendment request dated May 30, 1990 (JPN-90-042), for the James A. FitzPatrick Nuclear Power Plant, we have identified the need for additional information in order to complete the review. We, therefore, request that you provide a response to the questions enclosed.

The reporting and/or recordkeeping requirements of this letter affect fewer than ten respondents; therefore, OMB clearance is not required un r PL 96-511.

> Sincerely, ORIGINAL SIGNED BY

Daniel G. McDonald for

David E. LaBarge, Project Manager Project Directorate I-1 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Enclosure: As stated

cc: See next page

zue PDI-I:LA D:PDI-I CVogan O 100LaBarge:av1 RACapra 9-14-90 9/18/90 9/18/90

DOCUMENT NAME: LTR TO JOHN C BRONS TAC 76938

9009260014 900918 PDR ADOCK 05000333



NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20666

September 18, 1990

Docket No. 50-333

Mr. John C. Brons Executive Vice President - Nuclear Generation Power Authority of the State of New York 123 Main Street White Plains, New York 10601

Dear Mr. Brons:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - ACCIDENT MONITORING

INSTRUMENTATION AMENDMENT - JAMES A. FITZPATRICK NUCLEAR

POWER PLANT (TAC NO. 76938)

Based on our review of your Technical Specification amendment request dated May 30, 1990 (JPN-90-042), for the James A. FitzPatrick Nuclear Power Plant, we have identified the need for additional information in order to complete the review. We, therefore, request that you provide a response to the questions enclosed.

The reporting and/or recordkeeping requirements of this letter affect fewer than ten respondents; therefore, OMB clearance is not required under PL 96-511.

Sincerely,

To David E. LaBarge, Project Manager

Project Directorate 1-1

Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Enclosure: As stated

cc: See next page

. Mr. John C. Brons
Power Authority of the State of New York

James A. FitzPatrick Nuclear Power Plant

cc:

Mr. Gerald C. Goldstein
Assistant General Counsel
Power Authorit of the State
of New York
1633 Broadway
New York, New York 10019

Resident Inspector's Office U. S. Nuclear Regulatory Commission Post Office Box 136 Lycoming, New York 13093

Mr. William Fernandez Resident Manager James A. FitzPatrick Nuclear Power Plant Post Office Pox 41 Lycoming, New York 13093

Mr. J. A. Gray, Jr.
Director Nuclear Licensing - BWR
Power Authority of the State
of New York
123 Main Street
White Plains, New York 10601

Supervisor Town of Scriba R. D. #4 Oswego, New York 13126

Mr. J. P. Bayne, President Power Authority of the State of New York 1633 Broadway New York, New York 10019

Mr. Richard Patch Quality Assurance Superintendent James A. FitzPatrick Nuclear Power Plant Post Office Box 41 Lycoming, New York 13093

Charlie Donaldson, Esquire Assistant Attorney General New York Department of Law 120 Broadway New York, New York 10271 Ms. Donna Ross New York State Energy Office 2 Empire State Plaza 16th Floor Albany, New York 12223

Pegional Administrato:, Region I U. S. Nuclear Regulatory Commission 475 Allendale Road King of Prussia, Pennsylvania 19406

Mr. A. Klausman
Senior Vice President - Appraisal
and Compliance Services
Power Authority of the State
of New York
1633 Broadway
New York, New York 10019

Mr. George Wilverding, Manager Nuclear Safety Evaluation Power Authority of the State of New York 123 Main Street White Plains, New York 10601

Mr. R. E. Beedle Vice President Nuclear Support Power Authority of the State of New York 123 Main Street White Plains, New York 10601

Mr. S. S. Zulla
Vice President Nuclear Engineering
Power Authority of the State
of New York
123 Main Street
White Plains, New York 10601

Mr. William Josiger, Vice President Operations and Maintenance Power Authority of the State of New York 123 Main Street White Plains, New York 10601

ACCIDENT MONITORING INSTRUMENTATION

- 1. The proposed submittal would add the requirement to Specification 3.2.H that the instrumentation in Table 3.2-8 "must be operable whenever the reactor is critical and reactor coolant temperature is greater than or equal to 212°F." Please address the following concerns related to this proposed change:
 - a. For all of the instruments in Table 3.2-8, the proposed change to Specification 3.2. H seems to imply that both conditions of coolant temperature and reactor criticality must be in effect before the instrumentation is required to be operable. However, this is inconsistent with the requirements of primary containment integrity Specification 3.7.A.2, which states that the existence of either condition requires that primary containment integrity be in effect. Since many of the instruments are associated with monitoring of the primary containment, Specification 3.7.A.2 would seem to form the basis for the operability requirements for the instruments associated with the primary containment in the proposed change.
 - b. The proposed change does not include the primary containment integrity requirement of Specification 3.7.A.2 concerning fuel in the reactor vessel.
 - C. The proposed change to Table 3.2-8 would add certain Residual Heat Removal (RHR) system, RHR Service Water, and Core Spray (CS) system instruments. However, the proposed changes to Specification 3.2.H and to Table 3.2-8 do not recognize the operability requirements of the RHR and the CS systems of Specification 3.5.A or the definition of "Operable" stated in Specification 1.0.J.
- 2. The present TS Table 3.2-6 indicates that the number of reactor pressure channels provided by design is three and that the minimum number of operable instrument channels is two. The proposal would move this parameter to Table 3.2-8 and would indicate that only two channels are provided by design and that the minimum number required would be one. This change to the number of channels is not discussed in the submittal.
- 3. There appears to be no justification supplied for the significant differences between the Action Statement in the present TS and that shown in the submittal, for the following parameters:
 - a. Torus Water Level
 - Reactor Water Level (wide range)

- c. Reactor Water Level (fuel zone)
- d. Reactor Vessel Pressure
- e. Torus Water Temperature
- f. Drywell Temperature
- g. Drywell/Torus Differential Pressure

Please ensure that for every change that is proposed in the submittal, a corresponding explanation is provided.

- 4. The present TS Table 3.2-6 contains the Suppression Chamber Water Level (Wide Range, instrument. However, the wide range instrument is not indicated in the proposed TS change and there is no explanation for its deletion.
- 5. To be consistent with other applications of the term, a "/" should be placed between "Safety" and "Relief" shown on TS page 77d in the submittal.
- 6. The submittal describes deletion of Table 4.2-6 from the TS, which is on page 84 of the present TS and moves the "NOTES FOR TABLES 4.2-1 THROUGH 4.2-5" onto page 84. The result is that there is no page to show that Table 4.2-6 is intentionally blank, as was done on the new page 76 for deletion of Table 3.2-6. Thus, the numbering sequence of the tables would go from 4.2-5 to 2-7.